

CONTINUATION IN SUPPORT OF CRIMINAL COMPLAINT

I, Richard Suda, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this continuation in support of a criminal complaint against Jacob Russell Wolf for violations of Title 18, United States Code, Sections 113(a)(8), 1151, 1153, assault by strangulation, and Title 18, United States Code, Section 117, domestic assault by an habitual offender. Based on the information disclosed below, I submit there is probable cause to believe that on November 14, 2023, Wolf violated Title 18, United States Code, Sections 113(a)(8), 1151, 1153, and 117 in the Western District of Michigan. I, therefore, request the Court authorize the criminal complaint and an arrest warrant for Wolf.

2. I am a Special Agent with the FBI and have been since February 2023. I am currently assigned to the Marquette Resident Agency in Marquette County, Michigan. In my employment as an FBI Special Agent, I have received training in investigating various types of Federal criminal violations, including assault by strangulation. Prior to being hired by the FBI, I was employed by the Ohio Department of Public Safety as a State Trooper. During my almost 7 years of employment as an Ohio State Trooper, I completed many criminal investigations including investigations in vehicular homicide, aggravated assault, and various weapons related offenses.

3. This continuation is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

4. On November 14, 2023, the Marquette City Police Department responded to a report of a domestic assault at 2000 Bejig Drive, Marquette, Michigan (the “Residence”), which is in the Western District of Michigan.

5. When police arrived, they heard a man yelling inside the Residence. The victim allowed police to enter the Residence and an officer located Wolf near the top of the stairs. Wolf told the officer they would need to shoot him, while a minor witness stood nearby. After repeating the statement multiple times, the officer saw that Wolf was holding a small knife. Wolf said that if the officer did not shoot him, Wolf would stab the officer. After some back-and-forth, Wolf dropped the knife.

6. Marquette police officers then interviewed the victim. The victim reported that earlier that evening s/he and Wolf had started arguing over bills and their child. Wolf then told the victim to look Wolf in the eyes to show him respect. When the victim refused, the victim retreated to the bathroom, but Wolf pushed his way in, put his arm around her neck, and lifted her/him off the floor, making it so that the victim could not breathe. The victim said s/he was able to get away from Wolf, but then Wolf followed him/her around the Residence hitting her/him, kicking her/him, and biting her/his nose at one point. The victim said that at one point during the assault s/he was on her stomach on the floor while Wolf “choked” her/him by

putting his arm around his/her neck cutting off their air.

7. The victim reported a sore throat, neck pain, pain on the back of her/his head, and pain on her/his nose. The victim had visible bruising on her/his neck. The victim also had visible abrasions on her/his nose that victim said happened when Wolf bit her/his nose.

8. On November 16, 2023, Special Agent Richard Grout and I interviewed the victim at the Marquette County Sheriff's Office. The victim had abrasions on their nose and lower lip. Visible bruising was observed on the victim's neck. While speaking with the victim, their speech was observed to be raspy. The victim stated their voice has been more raspy than normal since the recent assault by Wolf. Bruising was also observed under the victim's right arm, near the armpit. The victim described their vision as being distorted since the assault.

9. During the interview the victim described the events of the attack on November 14, 2023, at the residence with greater detail. The victim stated that during the assault, Wolf strangled him/her approximately six separate times. The victim stated they were not able to breathe while being strangled by Wolf, and her/his vision started to get blurry and darken. The victim stated s/he attempted to get away. The victim stated s/he did not fight back with Wolf because s/he believed he would have only become more violent. At one point, Wolf was on top of the victim while the victim lay on the bed. The victim stated s/he were being strangled by Wolf while the minor witness was also on the bed. The victim recalled being kicked in the head by Wolf while s/he was on the bedroom floor.

10. The victim said that s/he and Wolf have been in a relationship for ten years and have a child in common. Wolf has two prior Michigan convictions for domestic violence that involve the same victim. First, on or about February 23, 2017, Wolf was convicted of domestic violence in violation of Michigan Compiled Laws Section 750.81(2), in Grand Traverse County Case No. 2016012572FH. Second, Wolf was convicted in 2023 of domestic violence in violation of Michigan Compiled Laws Section 750.81(2), in Marquette County Case No. 2023-230755SM-SM.

11. Wolf is an enrolled member of the Sault Ste. Marie Tribe of Chippewa Indians (SSMTCI), based on records received from SSMTCI. Further, the Residence is on land held in trust by the United States for the benefit of SSMTCI based on information I received from the Bureau of Indian Affairs.

CONCLUSION

12. I submit that this continuation establishes probable cause to believe that Wolf committed violations of 18 U.S.C. §§ 113(a)(8), 1151, 1153, and 18 U.S.C. § 117. I, therefore, request that the Court authorize the criminal complaint and issue an arrest warrant for Wolf's arrest.